

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
)	Criminal Action No.
v.)	2:24-CR-00084-MHH-JHE
)	
BERMUN DEAMON MCGHEE,)	
)	
Defendant.)	

MOTION TO AMEND BOND TO PERMIT INTERNATIONAL TRAVEL

COMES NOW, defendant Bermun Deamon McGhee, by and through counsel, and files this Motion to Amend Bond to Permit International Travel, as follows.

Mr. McGhee requests permission to travel to the Philippines from June 11, 2025 to July 3, 2025.

As a refresher, the bond conditions previously were amended to enable Mr. McGhee to travel to the Philippines on two prior occasions, with additional special conditions of bond put in place. Mr. McGhee satisfied the additional bond conditions, travelled to and from the Philippines, and returned to the Northern District of Alabama where he turned in his passport. The additional security posted in support of the initial trip remains in place.

The need for this third trip is that the earlier trips did not afford adequate time for Mr. McGhee to accomplish the designated tasks. Mr. McGhee

accomplished many of the tasks required to obtain a birth certificate, citizenship, and a passport for his newly born daughter, but he has an in-person appointment scheduled with the U.S. Embassy on June 30.

Additionally, another daughter has a “debut” on June 14th, which is a culturally and religiously significant event in the Philippines, similar to a Bat Mitzvah in the Jewish religion. And another daughter has a graduation ceremony on the week of June 20th.

Undersigned counsel inquired whether the Government and U.S. Probation consent. AUSA Rummage and USPO Officer Antoinette Murfree stated that they defer to the Court.

Conclusion

For the foregoing reasons, defendant requests that the Court permit Mr. McGhee to travel internationally from June 11, 2025 to July 3, 2025, thereby enabling him to accomplish these tasks, remain employed and earn an income, and see his family. The earlier trips to the Philippines conclusively established that Mr. McGhee is not a flight risk.

Respectfully submitted on this the 22nd day of May, 2025.

THE RICE LAW FIRM, LLC

/s/ Richard A. Rice, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing, which was prepared using Times New Roman 14-point font, was served electronically by operation of the Court's CM/ECF system, which will automatically send notice of such filing to all counsel of record.

This 22nd day of May, 2025.

/s/ Richard A. Rice, Jr.
Richard A. Rice, Jr.